

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STATE OF WASHINGTON,

Plaintiff,

v.

DONALD J. TRUMP *et al.*,

Defendants.

Civil Action No. 2:19-cv-01502-BJR

**SUPPLEMENTAL NOTICE
REGARDING SECTION 2808
CONSTRUCTION**

Defendants hereby provide this supplemental notice to the Court regarding the timing of ground-disturbing activities arising from construction authorized pursuant to 10 U.S.C. § 2808.

In a declaration filed on November 15, 2019, Defendants anticipated the earliest date on which any ground-disturbing activities could occur for these projects was 20 days after contract award, and the earliest date on which substantial construction could occur for these projects was 40 days after contract award. Declaration of Brigadier General Glenn A. Goddard ¶ 10, ECF No. 43-6. Although it will be adhering to this timeline for certain projects, the Corps is now positioned to begin ground-disturbing activities as early as five days after contract award and substantial construction as early as ten days after contract award, due to efficiencies that have been gained during the award and administration of the first several construction contracts. Further details regarding the anticipated start times for ground disturbing activities and substantial construction for the § 2808 projects are provided in the Second Declaration of Brigadier General Glenn A. Goddard, attached as Exhibit A to this notice.

DATED: January 22, 2020

Respectfully submitted,

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Assistant Attorney General

JAMES M. BURNHAM
Deputy Assistant Attorney General

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/s/ Leslie Cooper Vigen
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CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2020, I electronically filed the foregoing Supplemental Notice Regarding Section 2808 Construction using the Court's CM/ECF system, causing a notice of filing to be served upon all counsel of record.

Dated: January 22, 2020

/s/ Leslie Cooper Vigen
LESLIE COOPER VIGEN
Trial Attorney (D.C. Bar No. 1019782)